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*Attorneys for Defendant KD Creatives, Inc. d/b/a
Big Little Feelings*

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

JENNIFER CARRUTH, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

KD CREATIVES, INC. D/B/A BIG LITTLE
FEELINGS,

Defendant.

Case No. 2:24-cv-02484

**DECLARATION OF STARR DRUM IN
SUPPORT OF DEFENDANT'S REPLY IN
FURTHER SUPPORT OF MOTION TO
COMPEL ARBITRATION**

[FILED CONCURRENTLY WITH (1)
REPLY IN SUPPORT OF MOTION TO
COMPEL ARBITRATION AND (2)
OBJECTIONS TO EVIDENCE]

Date: February 3, 2025
Time: 1:30 p.m.
Courtroom: 4
Judge: Judge Dale A. Drozd

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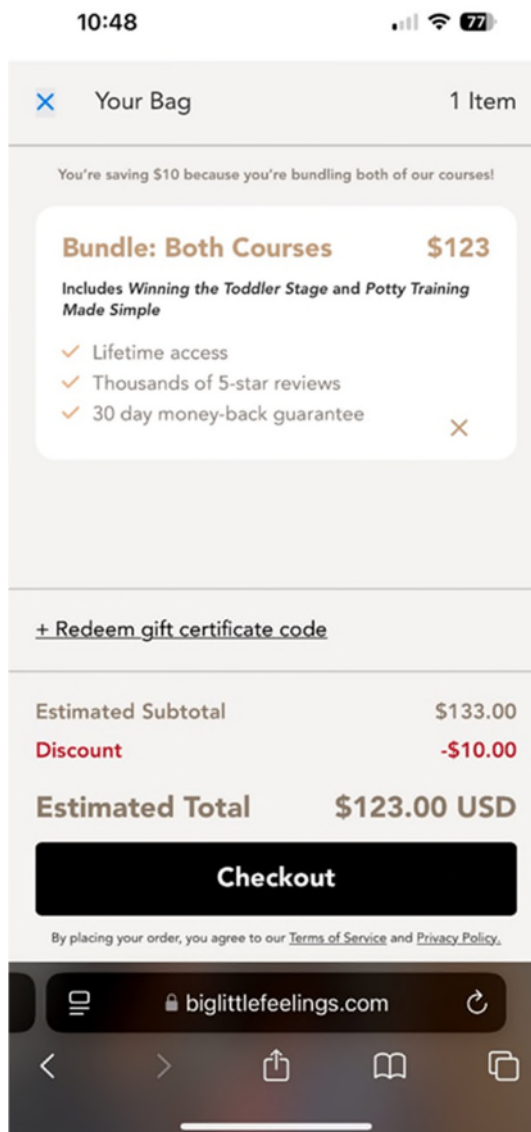
DECLARATION OF STARR DRUM

I, Starr Drum, declare as follows:

1. I am over the age of 18 and if called as a witness would testify as to the matters set forth in this Declaration. I am a member in good standing of the California Bar and of this Court. I am employed as a Shareholder with the firm Polsinelli LLP, and I have been retained by KD Creatives, Inc. d/b/a Big Little Feelings (“BLF”) to represent it in this matter. I have personal knowledge of the following facts and would testify to their truthfulness if called as a witness.

2. I have reviewed Mr. Hedin’s declaration and submit this declaration in response.

3. Below is a true and correct copy of a screenshot taken by me on January 10, 2025, at 10:48 a.m. CST on my personal iPhone of the checkout screen on BLF’s website:



1 4. I did not have to scroll down on this screen to see the phrase below the “Checkout”
2 button reading “By placing your order, you agree to our Terms of Service and Privacy Policy.”

3 I declare under penalty of perjury under the laws of the United States of America that the
4 foregoing is true and correct.

5 Executed on January 17, 2025.

6
7 /s/ Starr Drum

8 STARR DRUM
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